

EAG/GK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

AMENDED COMPLAINT

- against -

(18 U.S.C. § 249)

TIFFANY HARRIS,

20-H-10

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

Colleen Sheehan, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about December 27, 2019, within the Eastern District of New York and elsewhere, the defendant TIFFANY HARRIS did knowingly and willfully cause bodily injury to Victim #1, an individual whose identity is known to the affiant, because of the actual or perceived religion of such person.

(Title 18, United States Code, Section 249)

On or about December 27, 2019, within the Eastern District of New York and elsewhere, the defendant TIFFANY HARRIS did knowingly and willfully cause bodily injury to Victim #2, an individual whose identity is known to the affiant, because of the actual or perceived religion of such person.

(Title 18, United States Code, Section 249)

On or about December 27, 2019, within the Eastern District of New York and elsewhere, the defendant TIFFANY HARRIS did knowingly and willfully cause bodily injury to Victim #3, an individual whose identity is known to the affiant, because of the actual or perceived religion of such person.

(Title 18, United States Code, Section 249)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and am assigned to a squad that investigates criminal civil rights violations. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. On or about December 27, 2019, beginning at approximately 12:40 a.m., the defendant Tiffany Harris accosted and slapped three Orthodox Jewish women (Victims #1, #2 and #3) in Crown Heights, Brooklyn, causing physical pain to each, in three separate instances during an approximately ten-minute period of time. Two of the victims were wearing clothing that made them identifiable as Jewish. All of the victims were simply walking down the street when the defendant approached and assaulted them.

3. The first incident occurred at the southwest corner of Eastern Parkway and Kingston Avenue. At approximately 12:40 a.m., while walking in the street, the

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

defendant Tiffany Harris approached Victim #1, who was alone, and slapped her face with an open hand.

4. The second incident occurred at the southwest corner of President Street and Kingston Avenue, just three blocks away. At approximately 12:45 a.m., the defendant Tiffany Harris approached Victim #2, who was walking with five other Jewish people, two of whom were visibly Orthodox, and hit her on the back of her head with an open hand, and stated, "Fuck you Jews."

5. The third incident occurred at the southeast corner of the same intersection. At approximately 12:48 a.m., while walking in the street, the defendant Tiffany Harris approached Victim #3, who was walking with another visibly Orthodox woman, and slapped her in the face with an open hand.

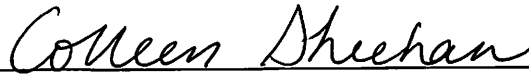
6. Following a report by Victim #1, police officers with the New York City Police Department ("NYPD") located the defendant Tiffany Harris in the vicinity of where the assaults occurred, after which Victims #1, #2 and #3 all positively identified the defendant at the scene as their assailant.

7. Later that morning, the defendant Tiffany Harris was advised of her Miranda rights, which she indicated she understood and agreed to waive. The defendant admitted the following in part and in substance.

- a. She had a confrontation with three separate Jewish women late the previous night while walking through the "Jewish neighborhood."
- b. She recalled slapping these women and cursing at them and also saying the words "Fuck you Jew."

The defendant Tiffany Harris explained that she believed the three women were Jewish because the neighborhood was known as a "Jewish neighborhood" and because of the manner in which the women were dressed.

WHEREFORE, your deponent respectfully requests that the defendant TIFFANY HARRIS be dealt with according to law.


Colleen Sheehan
Special Agent, Federal Bureau of Investigation

Sworn to before me this
28 day of February, 2020


THE HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK